

The consolidation of media has brought a marked decrease in the ability of local broadcasting to serve the public interest. This is not a matter of happenstance or anecdotal accounting. There are strong fundamental reasons why this is more likely than not to be the case.

The impact of business models

Under locally owned stations, management is inclined to provide broadcasting that has a focus on local community issues because local owners and local talent are part of the community and build their programming from their local experience. As such, local stations tend more to maintain their local, community oriented programming, even where it may be merely a selection of published recordings, and this goes a long way toward building a distinct sense of local community.

National chains consolidate their message as a matter of practice. Their business model has them drastically reducing or eliminating local talent. The entire staffing and operations is toward having a unified, sanitized product that represents the lowest common denominator for

their target market across the country. While local blurbs may be added to try to give a local flavor, it is artificial and in no way an effective substitute for the real thing.

#### Economic/financial incentives

Local stations have strong economic incentive to pursue a local focus for their programming, having less expensive, locally oriented material on hand and it being the basis of their operations. Conversely, there is a disincentive for local stations to rely entirely upon syndicated materials because they tend to add to their operating costs.

National chains, on the other hand, have every economic incentive to remove locally oriented programming. With their national focus, it is cheaper to create a single canned presentation that is sanitized of local flavor, then pump it everywhere. Where local flavor is stuck on is an afterthought, it adds an additional cost for the chain and tends to serve as a poor substitute for locally produced programming anyway.

So, local stations have an economic incentive for local programming in the form of the cost of buying syndicated programming, leading

them to better serve their community, while national chains have an economic incentive to reduce their service to local communities because under its business model doing so adds a significant cost to their operations.

#### Logistical incentives

Local stations, having less material than is available nationally, are more likely to incur the additional cost for supplementing their local programming with syndicated feeds. In contrast, with more available to create programming at the national level, the national chains are not logistically driven to incur additional cost and offer local programming out of a need for material.

These correlations between business model and the levels of local service provided result in the national chains being both financially and programatically inclined to reduce or eliminate locally oriented programming.

#### The dangers of consolidation vs fragmentation

The ability to control the message distributed to radio listeners and TV viewers is a power which when accumulated into one set of hands has a natural propensity

for abuse.

Power seeks to perpetuate itself or else it soon ceases to exist. The primary method for self perpetuation is to exercise the power in hand to whatever extent may be possible and, whenever able, to expand and accumulate more power (the alternative to the latter being to share power which weakens one's position.) The most effective at exercising and accumulating power tend to rise to the top and the others tend to fall to the side -- it is the darwinian survival of the most ruthless. To survive thus means pushing the use of power to its limits.

When such is the model, the abuse of power is not merely a propensity, it is a certainty.

#### Case example

Sinclair Broadcasting's having built a power base of numerous stations across the nation has decided to force their stations to air an anti-Kerry documentary days before the election.

Clearly, Sinclair uses the public airwaves free of charge and is obligated by law to serve the public interest.

Nonetheless, Sinclair is willing to risk of violating federal election and

communications laws  
because  
organizations which  
operate in a power  
based mode tend to  
conclude that the  
ends justify the  
means. This is not  
unique to Sinclair.

When the FCC's  
basis of decision  
making places  
monetary concerns  
and the potential  
for profits first,  
the organizations  
under its control  
place their power  
and profits above  
that public  
interest.

### Conclusion

The standard of  
decision making must  
be to preserve the  
wellbeing of the  
society in the  
operation of the  
broadcast media upon  
the public airwaves.

This means not  
allowing anybody to  
wield untold power  
to influence the  
outcome of our  
election process.  
It also means not  
allowing anybody to  
dominate control of  
the media across our  
society to distort  
or prevent  
legitimate discourse  
on public issues.

Sinclair's actions  
show why we need to  
strengthen media  
ownership rules, not  
weaken them. The  
FCC must hold  
licensees  
accountable to the  
communities in which  
they broadcast and  
put the onus upon  
the licensee to  
demonstrate that  
they have clearly  
been broadcasting  
for the community  
benefit.